

Exhibit B

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

MICHAEL SAUNDERS,

Plaintiff,

v.

CITY OF CHICAGO, *et al.*

Defendants.

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No. 12-cv-09158

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)

Hon. Robert M. Dow, Jr.

)

Magistrate Judge Sheila Finnegan

)

)

)

VINCENT THAMES,

Plaintiff,

v.

CITY OF CHICAGO, *et al.*

Defendants.

)

)

No. 12-cv-09170

)

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Hon. James B. Zagel

)

Magistrate Judge Maria Valdez

)

)

)

HAROLD RICHARDSON,

Plaintiff,

v.

CITY OF CHICAGO, *et al.*

Defendants.

)

)

No. 12-cv-09184

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)

Hon. Joan B. Gottschall

)

Magistrate Judge Sidney I. Schenkier

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)

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

TERRILL SWIFT,

Plaintiff,

v.

CITY OF CHICAGO, *et al.*

Defendants.

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Case No. 12-12995

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**PLAINTIFFS MICHAEL SAUNDERS', VINCENT THAMES', AND
TERRILL SWIFT'S FIRST SET OF REQUESTS FOR PRODUCTION TO
DEFENDANT JOHNSON AND PLAINTIFF MICHAEL SAUNDERS' FIRST SET OF
REQUESTS FOR PRODUCTION TO DEFENDANT VALENTINI**

Pursuant to Federal Rule 34, Plaintiffs Michael Saunders and Vincent Thames whose cases have been consolidated for discovery, and Plaintiff Terrill Swift, whose case in the Circuit Court of Cook County is being voluntarily coordinated for purposes of discovery with the cases in Federal Court, (collectively, "Plaintiffs"), request that Defendant Terence Johnson, and Michael Saunders requests that Defendant Fabio Valentini, ("ASA Defendants") respond to the following Requests for Production by April 8, 2013.

Definitions and Instructions

1. The term "Document" shall have the broadest possible meaning under the Federal Rules of Civil Procedure, and shall include any handwritten, typed, photographed, computerized, audio, video, or other graphic matter, regardless of how it is printed, stored or reproduced, in the possession and/or control of Defendant or known by Defendant to exist, whether or not claimed to be privileged or otherwise excludable from discovery. Any document with any marks of any sheet or side thereof, including but limited to: initials; routing instructions; date stamps; and any comment, marking or notation of any character which is not a part of the original and/or any reproduction thereof, is to be considered a separate document.
2. If there are no Documents in your possession, custody or control which are responsive to a particular request, so state and identify such request.
3. "State's Attorneys' Office" shall refer to the Cook County State's Attorneys' Office.
4. If any Documents responsive to this request are known by you to exist but are not in your possession, custody or control, identify said Document(s) and the Person who has possession, custody or control thereof.
5. "Relate", "relating to" or "regarding" shall mean directly or indirectly mentioning or describing, pertaining to, being connected with, reflecting upon, or having any logical or factual connection with a stated subject matter.
6. "Communications" shall refer to any form of communication, including, for example, letters, memos, e-mails, notes, or the like.

7. “Person” shall refer to any individual, corporation, partnership, organization, or any other entity.

8. “And” and “or” mean “and/or” so that the terms are given their broadest possible meaning. In construing a request, the singular shall include the plural and the plural shall include singular, and use of a masculine, feminine or neuter pronoun shall not exclude any of the others. The past tense includes the present and the present tense includes the past, where the clear meaning is not destroyed by the change.

9. “Complaints” shall refer to any complaint or criticism relating in any manner to a police officer’s job performance, whether ultimately deemed (un)sustained, (un)founded, or any other disposition. This includes, but is not limited to, all citizen complaints made to the Department’s Office of Professional Standards or Internal Affairs Division and all lawsuits filed in state or federal court alleging police misconduct.

10. Identify the production request to which each document produced is responsive.

11. If it is otherwise not possible to produce any document responsive to any request or if any part of said request is objectionable, please state the reasons for your inability to produce or your objections with specificity.

12. Please mark all Documents produced with an identifying number (i.e., a Bates Stamp number).

14. Any request for a Document is also a request to produce all iterations of that Document, including all earlier and all later versions of that Document.

15. If any Document is withheld under claim of privilege, please provide a privilege log identifying the Document, including its author and any recipients, and the basis for your privilege claims.

Requests for Production

1. All Documents in the ASA Defendants’ possession, custody, or control relating to any of the Plaintiffs—Harold Richardson, Michael Saunders, Vincent Thames, and Terrill Swift—and Jerry Fincher, with respect to the investigation and prosecution of Nina Glover’s murder, including through and beyond the post-conviction proceedings and exonerations.

2. Any organization chart in the ASA Defendants’ possession that includes one or more Defendants and that identifies Defendants’ chains of command from: November 1994 to November 1995.

3. Copies of any files maintained by the State’s Attorneys’ Office that are in any of the ASA Defendants’ possession, custody, or control relating to each of the ASA Defendants, including personnel files, internal affairs files, and training records.

4. All Documents relating to any Complaint alleging misconduct on the part of any of the ASA Defendants, including but not limited to any lawsuits.

Dated: March 8, 2013

Respectfully submitted,

/s/ Anna Benvenuti Hoffmann

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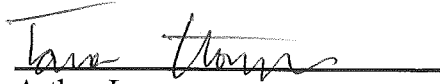
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CERTIFICATE OF SERVICE

I, Tara Thompson, an attorney, certify that I served a copy of the Plaintiff's Document Requests on the counsel of record in Cases 12-9158, 12-9170, 12-12995 and 12-9184 by electronic mail and United States Mail on March 8, 2013.

A handwritten signature in cursive script, appearing to read "Tara Thompson", is written over a solid horizontal line.

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Case No. 12-cv-9184